

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK

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9384-2557 Québec Inc., a Canadian : 1:19-CV-00501-TJM-CFH
corporation; MINEDMAP, INC., a Nevada
corporation; and SERENITY ALPHA, LLC, a
Nevada limited liability, and other similarly
situated individuals
EMERGENCY MOTION TO ADD
120 ST. PAUL STREET TO THE
WRIT OF REPLEVIN

Plaintiff, :

against : (ECF Case)

NORTHWAY MINING, LLC, a New York limited :
liability company; MICHAEL MARANDA, an
individual; MICHAEL CARTER, an individual;
CSX4236 MOTORCYCLE SALVAGE, LLC, a New
York limited liability company; DROR SVORAI,
an individual; MINING POWER GROUP, INC., a
Florida corporation; HUDSON DATA CENTER,
INC, a New York Corporation, MICHAEL
MARANDA, LLC, a New York Limited liability
company; PORTER KING HILL CONTRACTING,
LLC, a New York limited liability company;
COINMINT, LLC, a Delaware limited liability
company; OSWEGO DATA LLC, a New York
Limited Liability Company; LORI S. THOMPSON,
LCSW, PLLC, a professional limited liability
corporation; LORI S. THOMPSON, an individual,
ANTHONY PORTER, an individual; and DONALD
D'AVANZO, an individual

Defendants. :

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Plaintiffs, Serenity Alpha et. al., through counsel, WILLIAMS LLP files this Emergency Motion requesting that this Court Amend the current Writ of Replevin to Add the Address at 124 St. Paul Street Oswego, New York.

1. Despite Defendants' representations that Plaintiffs' miners are at 193 Seneca Street and 2140 County Route 1, those representations are false, and Defendants' and their attorneys knew those representations were false when they made them. Defendants moved Plaintiffs' miners to 120 St. Paul Street Oswego, New York—another building that is close to the wrong addresses Defendants provided to this Court and to Plaintiffs. The landlord of 120 St. Paul Street has indicated that he is willing to voluntarily allow Plaintiffs' access to 120 St. Paul Street, but the US Marshal needs a Court order authorizing entry before they can enter to seize miners. The US Marshall will remain onsite for the next hour or so.

2. In light of the foregoing, Plaintiffs therefore request, in emergency fashion, that this Court amend the Writ of Replevin to include the address at 120 St. Paul Street Oswego, New York. Plaintiffs filed a Motion yesterday to make this request under seal to prevent Defendants, with assistance from their attorneys, from again moving Plaintiffs' miners. The undersigned also tried contacting the Court yesterday to no avail.

Dated this 24th day of July 2020.
New York, New York

RESPECTFULLY SUBMITTED,

/s/ T. Edward Williams, Esq.

T. Edward Williams, Esq. Bar No. 5634738

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of July 2020, this EMERGENCY MOTION TO ADD 120 ST. PAUL STREET TO WRIT OF REPLEVIN was served on the following individuals:

John Harwick, Esq. via ECF
Benjamin F. Niedl, Esq. via ECF
Counsel for Maranda Defendants